

2:20-cv-372-JMS-MJD

UNITED STATES DISTRICT  
COURT  
SOUTHERN DISTRICT INDIANA  
TERRE HAUTE DIVISION

**FILED**

4:39 pm, Jul 20, 2020

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
Roger A.G. Sharpe, Clerk

ANTONIO CRAWFORD #43793-424  
[PLAINTIFF]

Vs.

UNKNOWN NAMED Penitentiary WARDEN

UNKNOWN named Penitentiary Executive Assistance

UNKNOWN NAMED REGION DIRECTOR

UNKNOWN NAMED DIRECTOR

[DEFENDANTS]

PETITION TO 28 U.S.C § 1331  
BIVENS CIVIL RIGHTS ACTION / Memorandum

Complaint

1) This court retains Jurisdiction, Pursuant  
to 28 U.S.C § 1331(a)

2) Plaintiff, Antonio CRAWford 43793-424 is  
a Federal Prisoner, currently confined, inside  
the UNITED States Penitentiary, located in Terre

Page 2

HAUTE, IN P.O. box 33 TERRE HAUTE, IN  
47808 In this, court's respective Jurisdiction

3) DEFENDANT # 1 Name, IS unknown, who  
IS a Federal Prison WARDEN, At the  
UNITED STATES Penitentiary ATLANTA  
address unknown, at Present time

4) DEFENDANT # 2 NAME, IS unknown, who  
IS a Federal Prison Executive Assistance,  
at the UNITED STATES Penitentiary IN Atlanta  
GA, Address unknown at Present time

5) DEFENDANT # 3 name, IS unknown, who  
IS a Federal Prison REGIONAL, Director  
For the Nations, South EAST Area, Federal  
Prisons. Address unknown, at Present  
Time

6) DEFENDANT # 4 name IS unknown, who  
IS a Federal Prison Director, Address  
320 First Street, N.W Washington D.C  
20534

7) PLAINTIFF (Mr. Crawford) Alleges, that these,  
Federal Defendants has, Individually, Failed,



Page 3

To Protect, the Plaintiff, who is, a Prisoner in there, Custody Resulting in ongoing Inhumane conditions, causing Plaintiff's Injuries and Imminent Danger he still, Faces, the conditions defendant is Subjecting Plaintiff to, is banned, by the LAWS, Treaties and constitution of, the UNITED States and Immediate, Judicial HALT, is needed to Avoid, Irreparable HARM. Plaintiff Demands, this court to consider all Attached material Facts, and make a Ultimate ruling, with relief Preliminary and Permanent Injunction barring, Plaintiff's future confinement in All, UNITED States Penitentiaries and Federal CORRECTIONAL INSTITUTION(S) Punitive and Compensation Damages sum AMOUNT TEN THOUSAND DOLLARS zero zero cents, TAX Immunity

## STATEMENT OF FACTS

8) Plaintiff (Mr. Crawford) was Federally convicted to a Imprisonment term, 70 months in 2015, for threaten Federal Agents, who sentenced fellow gang members, see ( U.S. V. CRAWFORD 13 CR 10048 11.C.D)

Page 4

9) 4 years later, Mr. Crawford commenced, the imprisonment, in August 2019 Year, the Federal Prison, designated, Mr. Crawford to the United States Penitentiary Big Sandy, located in East, Kentucky (A high security Penitentiary designed, to house more Troublesome Prisoners opposed, than Federal Correctional centers (low security) to carry out, the 70 month imprisonment term

10) Approximately 10-16-2019 Year Mr. Crawford, while, in Transit, was temporarily, designated, to the, United States Penitentiary in Atlanta, GA, awaiting on ultimate, transportation to designated, Penitentiary Big Sandy in East, Kentucky

11) United States Penitentiary in Atlanta, GA is a transit center, that houses all Federal Prisoners of different, Security Classifications awaiting, Transportation to designated, Federal Prison, in Mid-Atlantic, or South region of, the United States

12) Approximately 10-17-2019 at 9:00 - 12:00 PM While, Plaintiff was confined, at United States



Page 5

13) Penitentiary Atlanta Transit Center, members from his Security Threat Gang (called the "Vice Lords") addressed him in a warning threaten manner, notifying Plaintiff that there's a "green light" when I get to Big Sandy from my Security Threat gang, for my conviction bringing unwanted attention to the Security Threat gang and I'm a Homosexual

14) Plaintiff immediately submitted a electronic request, on the Inmate Computer, to Defendant # 1, (WARDEN of Penitentiary) notifying Defendant that "It is Documented, in my Inmate File, I am Affiliated with a Security Threat Gang, "Vice Lords". Due to my conviction, the gang want to kill me they threatened me, when I arrive to Big Sandy Penitentiary, they will kill me"

15) Plaintiff additionally submitted a electronic request, on the Inmate Computer to Defendant # 2, (unknown named Penitentiary Executive Assistance) explaining the same, here above in Paragraph 14

16) Plaintiff requested, for above two,

Page 6

Defendants to stop, the Transportation, to UNITED States Penitentiary, BIG Sandy, he Fear for his, life there

17) The 2 Defendants, verified Plaintiffs Threaten Nature, to his life and Placed Plaintiff in there, Special housing unit (S.H.U) for his Safety temporarily,

18) Few Days After, the 2 Defendants allowed, the Plaintiff to be delivered in the hands of the Security threat Gang, (Transferred to UNITED States Penitentiary big Sandy) see (B.O.P Inmate Transfer)

19) Approximately 10-24-2019, Plaintiff Arrived to UNITED States Penitentiary BIG Sandy

20) Plaintiff Immediately notified, the big Sandy Penitentiary officers he Fears, for his life, at this Penitentiary, due to his Gang Placed, a murder on his head, due to his conviction brought, Unwanted Attention to there Criminal organization, and he is a Homosexual banned, by organization Laws

21) Prison officials at big Sandy notified,



Page 7

22) Plaintiff that there, Special housing unit (S.H.U) is full, due to the ongoing violence, at the Penitentiary

23) Big Sandy Prison officials Placed, the Plaintiff and, new Prison Arrivals in a Isolated, new Arrival Classification unit, for 2 weeks temporarily, not in relation to safety reasons but a intake introduction cause

24) after Plaintiff was transferred, to intake unit, Plaintiff notified, his unit Counslor, about his safety crisis, she directed him to file, a Administrative remedy directly, to the regional Director who overseas, UNITED States Penitentiary Atlanta, since The warden at big sandy can not, meet your relief the incodent did not, orgin here, and united states Penitentiary Atlanta can no, longer meet your sensitive issue, file a B.P. 10 to region of the South East

25) 11-6-2019 Year Plaintiff notified

Page 8

Defendant # 3 (Unknown Named region Director) that while, confined in his Prison, his Security threat gang warned him, that there's a murder on his head, in all UNITED States Penitentiaries and FEDERAL Correctional Institutions, by Security threat gang for bringing unwanted Attention, to the criminal organization and he is a homosexual who identify himself, as a female, Against, the gang laws

26) Plaintiff additionally, requested a Transfer from, big Sandy Penitentiary

27) Approximately 11-7-2019 Plaintiff was Transferred, from the Penitentiary Intake Unit, to General Population b-1 unit

28) Plaintiff was Placed, in a Isolated Prison Cell, with this over weight black Prisoner, who Immeadetly, identified, Plaintiff as the wonted, member. The black Prisoner was a Associate, of the Security threat gang, from the MID-WEST gang Card that is controled, by all



Page 9

members who are from the nation's MID-west States

29) the black Prisoner, Pulled a long hand made Prison Knife, threatened Plaintiff to get off, the Prison Compound and never step, on Any MID-west Penitentiary or Federal correctional Institution Compound, (that's ran by Security threat gang Vice Lords and Allied MID-west Cards)

30) Big Sandy Prison official Immediately moved, Plaintiff Into, a Isolated office

31) Plaintiff Demanded, to be removed from this, Prison For Preservation, of his life

32) big Sandy Prison official's threatened Plaintiff, to go in another vacate cell away, from that Inmate or they will beat him up see (b-1 unit camera)

33) Plaintiff was escorted to another prison cell on same, unit (b-1 unit)

34) Approximately 2-2-2020 Plaintiff was Transferred, to Another, high Security Penitentiary In, Terre Haute, that Possess a significant risk, to Plaintiff Safety, due to these, Violent conditions, he is subjected to (excessive Drugs on compound, mentally ill inmates, rapist, covid 19 virus, and all inmates forced in cell 22 hours a day, triggering violence amongst prisoners)

35) This, high Security Penitentiary Places Plaintiff who is vulnerable, at Significant Risk

36) Plaintiff Safety is still at significant risk, due to this, Prison houses his, ex gang that want, to harm him

37) 3-31-2020 the regional Director (Defendant # 3) replied back, to Plaintiff Sensitive request, concerning his Safety See (Exhibit A) who did not deny Plaintiff Allegations

38) Defendant # 3 Alleges, that due to he (Plaintiff) did not, Properly write the full detail, on the Small Form Administrative Remedy Form, and Plaintiff address issue on wrong level Denied Plaintiff needed relief on that reason



Page 11

39) region Director (Defendant number 3)  
Failed, to Protect, Plaintiff

40) Plaintiff then, notified the Ultimate Defendant (Prison Director) of his, safety crisis see (Exhibit A)

41) the Ultimate Defendant (Prison Director) agreed with its colleague, (region Director) see (Exhibit A)

42) Director (Ultimate Defendant) Failed, to Protect, Plaintiff too

43) Plaintiff possess no, other Lawful remedy to Preserve his life, in these Maximum Security Prisons, that houses Societies, most Violent People, in close Proximity

44) Plaintiff exhausted his Administrative remedies who did not, rebut Plaintiff, Allegations

45) All Defendants Know, Plaintiff's Risk, to his life

46) all Defendants Failed, to Protect Plaintiff

Page 12

47) Plaintiff Alleges, ~~that~~ these Federal Defendants, Individually, Acted in Color of law, by Failing to Protect, this Prisoner (Plaintiff) in there, Prisons resulting in ongoing, Inhumane conditions causing Plaintiff's Injuries and Imminent ~~Rings~~, he still, Faces these conditions defendant is Subjecting Plaintiff, to is banned, by the LAWS, Treaties and constitution of the UNITED STATES and Immeadete, Judicial Halt, is need, to abate Irreparable Harm to Plaintiff

### CAUSE OF ACTION

Plaintiff incorporates the above, Paragraphs 1-47 to support his claim

#### COURT 1 FAILURE TO PROTECT claim

48) Federal LAW commands, Federal Prison OFFICIALS, to Protect the life of its, Prisoners by abating, risky conditions

49) Above Defendants, are Federal Prison OFFICIALS, delegated with government Powers, to Protect



Page 13

CLASSIFY PLAINTIFF who Possess Vulnerability

S0) Above Defendants know, Plaintiff is a 135. Lbs Homosexual that Projects Female Appearances around Violent Prisoners, significantly at RISK

S1) Defendants know, Plaintiff was a part of a Security Threat Gang (VICE Lords) that is made up, of Dangerous, members housed, in All United States Penitentiaries and FEDERAL CORRECTIONAL INSTITUTIONS around the UNITED States

S2) Defendants know that those same, gang members want to kill Plaintiff see (EXHIBIT A) Defendants don't dispute

S3) Defendants know, that Plaintiff is still, housed in a high security United States Penitentiary Around those Violent gang members

S4) Defendants know, in its high security Prisons Homosexual Rape, staff Assaults, Violent Abuses, Amongst

Page 14

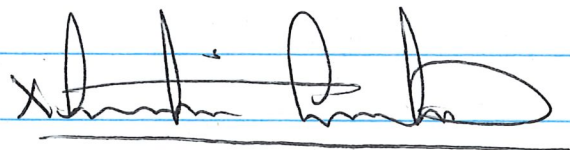
Prisoners is inevitable in this, environment  
that houses societies most violent prisoners

WHEREFORE Plaintiff Demands this court  
to make a Ultimate ruling based on  
attached material Facts that unlawful  
Acts commenced then a Declaratory  
Judgment stated hereunder

1) Preliminary and Permanent Injunction  
Barring Plaintiff's Future Confinement  
in ANY and All UNITED STATES Penitentiaries  
and FEDERAL Correctional Institution(s)  
or any Prison in MID-Atlantic, South  
OR NORTH CENTRAL REGION

2) Compensation and Punitive Damages  
in Sum Amount TEN THOUSAND DOLLARS  
(\$10,000.00) TAX Immunity

Written in Good Faith Supported  
with Affidavit on 7-13-2020 Year



Pro-Se Plaintiff

ANTONIO CRAWFORD

43793-424

U.S.P Terre Haute

P.O. box 33

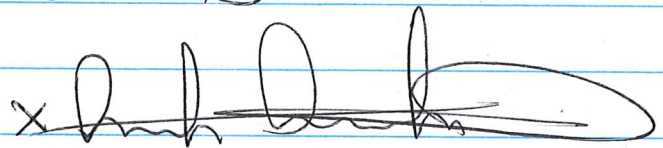
Terre Haute, IN 47808



AFFIDAVIT § 1621 PerJury

I Swear that Every word Placed in this  
Complaint is True IF it is  
found Not True I shall be Subjected  
to Penalties Pursuant to § 1621

Subscribe In Sworn to me on  
7-13-2020



Antonio CRAWFORD

43793-424

CERTIFICATE OF SERVICES

I (ANTONIO CRAWFORD) certify that on  
July 13<sup>th</sup> 2020 I Placed this Foregoing  
in the U.S. Postal Service to be  
mailed to the Clerk court to  
Electronically File the Foregoing Participants  
in this case Automatically will be  
SERVED by ECF/CMS System  
Subscribed in Sworn

7-13-2020

